

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SALVADOR VASQUEZ,)	
)	
Plaintiff,)	1:12-cv-5029
)	
v.)	
)	Magistrate Judge Finnegan
PROFESSIONAL BUREAU OF)	
COLLECTIONS, INC.,)	
)	
Defendant.)	

STIPULATION TO DISMISS PURSUANT TO SETTLEMENT

By agreement, the parties to the above-captioned action, by and through their respective attorneys, state as follows:

1. Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, the parties hereby stipulate and agree that the above-captioned action shall be dismissed without costs to either party in anticipation that all costs shall be paid and all matters in controversy for which said action was brought shall be fully settled, compromised and adjourned.
2. The parties have reached a settlement accord and are in the process of resolving all remaining issues, such as the terms of the settlement agreement and the conditions for payment of the settlement proceeds.
3. In order to ensure that this Court retain jurisdiction to enforce the settlement agreement between the parties, should the need arise, the parties stipulate that the dismissal of the above captioned matter shall be without prejudice, without costs to

either party, and with leave for any party to seek reinstatement within forty-five (45) days from the date of entry of this Stipulation to Dismiss.

4. The parties further stipulate that if this case has not been reinstated within forty-five (45) days from the date of entry of this Stipulation, or a motion for reinstatement has not been filed by said date, then the dismissal of this case shall automatically convert from a dismissal without prejudice to a dismissal with prejudice.
5. The parties stipulate the status on October 29, 2012 be stricken.

Date: October 18, 2012

**For Plaintiff,
Salvador Vasquez**

**For
Defendant, Professional Bureau of Collections,
Inc.**

/s David M. Marco
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